

Commonwealth of Massachusetts

SUFFOLK, SS.

TRIAL COURT OF THE COMMONWEALTH  
SUPERIOR COURT DEPARTMENT  
CIVIL DOCKET NO. 193862C

Raheem Rashed Abubardar, PLAINTIFF(S),

v.

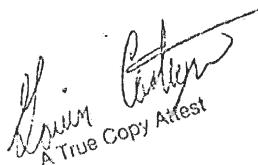
Detective Ismael Henriquez, et. al. DEFENDANT(S)

SUMMONS

THIS SUMMONS IS DIRECTED TO Detective Ismael Henriquez (Defendant's name)

You are being sued. The Plaintiff(s) named above has started a lawsuit against you. A copy of the Plaintiff's Complaint filed against you is attached to this summons and the original complaint has been filed in the Suffolk Superior Court. YOU MUST ACT PROMPTLY TO PROTECT YOUR RIGHTS.

1. You must respond to this lawsuit in writing within 20 days. If you do not respond, the court may decide the case against you and award the Plaintiff everything asked for in the complaint. You will also lose the opportunity to tell your side of the story. You must respond to this lawsuit in writing even if you expect to resolve this matter with the Plaintiff. If you need more time to respond, you may request an extension of time in writing from the Court.
2. How to Respond. To respond to this lawsuit, you must file a written response with the court and mail a copy to the Plaintiff's Attorney (or the Plaintiff, if unrepresented). You can do this by:
  - a. Filing your signed original response with the Clerk's Office for Civil Business, Suffolk Court, 3 Pemberton Square, Boston, MA 02108 (address), by mail or in person, AND
  - b. Delivering or mailing a copy of your response to the Plaintiff's Attorney/Plaintiff at the following address: 1342 Belmont Street, Suite 102, Brockton, MA 02301
3. What to include in your response. An "Answer" is one type of response to a Complaint. Your Answer must state whether you agree or disagree with the fact(s) alleged in each paragraph of the Complaint. Some defenses, called affirmative defenses, must be stated in your Answer or you may lose your right to use them in court. If you have any claims against the Plaintiff (referred to as counterclaims) that are based on the same facts or transaction described in the Complaint, then you must include those claims in your Answer. Otherwise, you may lose your right to sue the Plaintiff about anything related to this lawsuit. If you want to have your case heard by a jury, you must specifically request a jury trial in your Answer or in a written demand for a jury trial that you must send to the other side and file with the court no more than 10 days after sending your Answer. You can also respond to a Complaint by filing a "Motion to Dismiss," if you believe that the complaint is legally invalid or legally insufficient. A Motion to Dismiss must be based on one of the legal deficiencies or reasons listed under Mass. R. Civ. P. 12. If you are filing a Motion to Dismiss, you must also comply with the filing procedures for "Civil Motions" described in the rules of the Court in which the complaint was filed, available at [www.mass.gov/courts/case-legal-res/rules-of-court](http://www.mass.gov/courts/case-legal-res/rules-of-court).

  
JENNIFER L. CULLINAN  
A True Copy Attest

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUFFOLK SUPERIOR COURT  
CIVIL NO. 1984CV3862C

RAHEEM RASHED ABUBARDAR

v.

DETECTIVE ISMAEL HENRIQUEZ, et, al;  
BADGE NUMBER 91894  
AREA B-2 STATION  
AND  
MR. WILLIAM G. GROSS  
THE BOSTON POLICE COMMISSIONER

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**1<sup>st</sup> AMENDED CIVIL COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL**

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**A. Introduction**

1. Plaintiff, Raheem Rasheed Abubardar, is a resident of the city of Boston. He was required to register as a sex offender with his local Police Department pursuant to Sex Offender Registry Laws c. 6 §§ 178C - 178Q. On October 23, 2018, as required by governing law, Mr. Abubardar went to the Area A-1 Police Department in the City of Boston and executed the required Sex Offender Registration Forms. On the forms that he executed, Mr. Abubardar identified his primary address as 724 Shawmut Avenue, Roxbury, Massachusetts 02119, and his secondary address as 9 Joseph Street, Dorchester, Massachusetts 02124. On or about March 11, 2019, Detective Henriquez filed a criminal complaint against Mr. Abubardar falsely alleging that Mr. Abubardar had a new residential address and failed to report it. Mr. Abubardar, however, was in fact residing at 9 Joseph Street, Dorchester and Defendant Henriquez had failed to conduct any investigation into Mr. Abubardar's presence at that address. Mr. Abubardar was charged with a felony offense of Failing to Register as a Sex Offender in the Boston Municipal Court, but on December 10, 2019 the case against Mr. Abubardar was dismissed. Mr. Abubardar had complied with his registration obligations; he had not committed the offense falsely alleged in the police report authored by Detective Henriquez which caused his prosecution.

**B. Parties**

2. Plaintiff, Raheem Rasheed Abubardar, is and was, at all times, a resident of the City of Boston.
3. Defendant, Detective Ismael Henriquez, is a Boston Police Officer with a rank of Detective assigned to the Sex Offender Unit in the capacity of Investigative Compliance Officer at the

Boston Police Area B-2, located at 2400 Washington Street, Roxbury, Massachusetts 02119. Defendant Detective Henriquez is, and was, at all relevant times, a Boston Police Detective working for the City of Boston in Suffolk County, and all actions taken by Defendant Henriquez in connection to the instant complaint were done under the color of law.

### **C. Factual Allegations**

4. Mr. Abubardar is a 58-year-old male who resides in the City of Boston.
5. At all relevant times Mr. Abubardar was classified as a Level 3 Sex Offender with the Massachusetts Sex Offender Board.
6. On October 23, 2018, Mr. Abubardar went to Area A-1 Boston Police Department to fill out his annual Sex Offender Registration Form. During this process Mr. Abubardar identified two residential addresses; a primary address of 724 Shawmut Avenue in Roxbury, Massachusetts 02119 and a secondary address of 9 Joseph Street, Dorchester, Massachusetts 02124 (See Exhibit A).
7. Mr. Abubardar identified both addresses: 724 Shawmut Avenue in Roxbury as well as 9 Joseph Street in Dorchester as his primary and secondary addresses as required by G.L. c. 6 § 178C.
8. Sometime on or about March 26, 2019 Defendant Henriquez sought a criminal complaint against Mr. Abubardar alleging the felony offense of Failing to Register as a Sex Offender under a subsequent offense in violation of G.L. c. 6 § 178H and the date of the offense alleged to have been March 15, 2019.
9. The only document pertaining to the criminal complaint to provide a supporting basis for the criminal charge was an incident report dated March 25, 2019 with a narrative dating March 15, 2019. The narrative supporting the criminal complaint states as follows:

“On 3/15/19, Raheem Abubardar with a date of birth of 10/3/1962, being a Sex Offender, as defined in G.L. c. 6 § 178C, with who was required to register pursuant to G.L. c. 6 § 178C-179Q (1) did knowingly fail to register, or (2) did knowingly fail to verify registration information, or (3) did knowingly fail to provide notice of a change of address, or (4) did knowingly provide false information, the defendant having previously been convicted in Plymouth Superior Court on 8/6/1991 of an offense, specifically, Rape, Docket #89868.

“Being a convicted level 3 sex offender, Mr. Abubardar did fail to register with the Boston Police Sex Offender Registry Unit (SORI Unit) as of 3/25/19. Mr. Abubardar failed to notify the SORI Unit of a change of address per address audit by detectives. Mr. Abubardar was placed in violation for not registering as a sex offender.

“Warrants to be sought out of Boston Municipal Court Central Division for Failure to Register as a Sex Offender, second and subsequent, as suspect was convicted on

2/01/2007 out of Plymouth Superior Court for failure to register as a sex offender, docket #201300192006.” (Exhibit B).

10. Defendant Henriquez did not include copies of the Sex Offender Registration Forms executed by Mr. Abubardar on October 23, 2018 with the criminal complaint. Nor did he provide any other documentation that would have informed the clerk magistrate that Mr. Abubardar had two residential addresses that he had registered at.
11. At no time did Defendant Henriquez himself investigate whether Mr. Abubardar was residing at 9 Joseph Street in Dorchester, Massachusetts as he had been, nor did he cause any other investigating officer to do so.
12. As a result of the criminal complaint application sought by Defendant Henriquez, a warrant for Mr. Abubardar’s arrest was issued.
13. On or about March 27, 2019, Mr. Abubardar went to see his probation officer at the Suffolk Superior Court.
14. On March 27, 2019, while sitting in the hallway at Suffolk Superior Court, court officers came and placed Mr. Abubardar in custody on his outstanding warrant. Mr. Abubardar was taken to the lockup facility of the Court and subject to a strip search and held in custody until he was presented to the Court for determination on whether Mr. Abubardar should be held or released on conditions.
15. On March 27, 2019, a Judge of the Suffolk Superior court immediately released Mr. Abubardar from custody on the warrant out of the Boston Municipal Court and ordered that Mr. Abubardar appear in the Boston Municipal Court to address the warrant the following day.
16. On March 28, 2019, Mr. Abubardar appeared in the Boston Municipal Court Central Division and was arraigned on Docket No. 1901CR1484 that alleged the offense Sex Offender: Failure to Register, subsequent offense.
17. On May 21, 2019 the Commonwealth moved to dismiss the subsequent offense portion of the Docket No. 1901CR1484 such that the complaint only alleged the offense of Failure to Register as a Sex Offender.
18. On December 10, 2019 the Suffolk County District Attorney’s Office dismissed the complaint against Mr. Abubardar stating, “The Commonwealth cannot meet its burden at trial.” The Commonwealth’s Nolle Prossed was accepted and the matter was dismissed (Exhibit C).
19. As a result of Defendant Henriquez’s actions Mr. Abubardar was subject to arrest and prosecution for a crime that he did not commit. Mr. Abubardar suffered the loss of his Constitutional rights and the embarrassment, humiliation and distress associated with his arrest and prosecution for charges as to which he was innocent.

20. As a direct and proximate result of the defendant's unconstitutional actions as described above, Mr. Abubardar suffered restriction of his personal freedom, mental anguish, emotional distress, humiliation, and injury to reputation. The mental and emotional anguish was significant, and interfered with Mr. Abubardar's sleep, appetite, and manifested itself in other physical symptoms including shaking, nausea, a racing heart, and gastrointestinal problems.
21. As a direct and proximate result of Henriquez's unconstitutional actions described above, Mr. Abubardar suffered severe anxiety, depression, and other mental anguish.

**Count I: 42 U.S.C. § 1983, False Arrest**

22. The above paragraphs are incorporated by reference.
23. Defendant Henriquez caused Mr. Abubardar's arrest without probable cause.
24. Defendant Henriquez deprived Mr. Abubardar of his clearly established and well-settled rights under Fourth and Fourteenth Amendment to be free from unreasonable seizure of his person.
25. Defendant Henriquez acted with knowing or reckless disregard of Mr. Abubardar's constitutional rights.
26. As a direct and proximate result of defendants' actions, Mr. Abubardar suffered the damages described above.

**Count II: 42 U.S.C. § 1983, Malicious Prosecution**

27. The above paragraphs are incorporated by reference.
28. When Mr. Abubardar was arrested, Defendant Henriquez lacked probable cause to believe Mr. Abubardar had committed the crimes he was charged with.
29. Nevertheless, Defendant Henriquez commenced or caused to be commenced a criminal prosecution in the Boston Municipal Court, instituted with malice and without probable cause against Mr. Abubardar.
30. Criminal complaint No. 1901CR1484 ultimately terminated in Mr. Abubardar's favor on December 10, 2019 when the case was dismissed.
31. Defendant Henriquez conduct violated Mr. Abubardar's clearly established rights under the Fourth Amendment and the procedural due process component of the Fourteenth Amendment.
32. As a direct and proximate result of Defendant Henriquez 's actions, Mr. Abubardar was prosecuted for a crime he did not commit. He suffered the injuries and damages as set forth above.

**Count VI : Intentional Infliction Of Emotional Distress**

46. The above paragraphs are incorporated by reference.
47. In doing the acts alleged above, Defendant Henriquez intentionally or recklessly cause infliction of emotional distress upon Mr. Abubardar when he acted with either the desire or knowledge to a substantial degree of certainty that significant emotional distress would result from his conduct.
48. The conduct of Defendant Henriquez, as alleged above, was extreme and outrageous, beyond all bounds of decency, and intolerable in a civilized society. At issue is conduct either designed or reasonably anticipated to harm Mr. Abubardar, which evinces improper illegal, unethical, oppressive, unscrupulous, and/or otherwise unconscionable conduct.
49. The conduct of Defendant Henriquez directly and proximately caused Mr. Abubardar to suffer, and from which he continues to suffer, significant emotional distress, trauma, shock, anxiety, humiliation, embarrassment, fear, and terror.

WHEREFORE, the plaintiff requests that this Court:

1. Award compensatory damages;
2. Award punitive damages against the Defendant;
3. Award the costs of this action, including reasonable attorney's fees; and
4. Award such other further relief as this Court may deem necessary and appropriate.

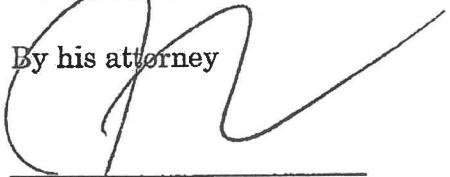
**JURY DEMAND**

A jury trial is hereby demanded.

Respectfully Submitted,

Raheem Rasheed Abubardar

By his attorney



\_\_\_\_\_  
Jason Benzaken, Esq.  
Benzaken & Wood, LLP  
1342 Belmont Street, Suite 102  
Brockton, MA 02301  
(Telephone) 508-897-0001  
(Fax) 508-587-5455  
BBO No. 658869  
*attorneybenzaken@gmail.com*

Dated: July 1, 2020

# EXHIBIT A



The Commonwealth of Massachusetts  
Executive Office of Public Safety and Security  
Sex Offender Registry Board

CHARLES D. BAKER

KATHY E. POLITO  
Lieutenant Governor

P.O. Box 4547

Salem, Massachusetts 01970

Tel: (978) 740-6400, Fax: (978) 740-6464

[www.mass.gov/sorb](http://www.mass.gov/sorb)

DANIEL BENNETT  
Secretary  
KEVIN R. HAYDEN  
Commissioner

OCTOBER 01, 2018

RAHEEM ARIBARDAR  
724 SHAWMUT AVE  
ROXBURY, MA 02119

County: SUFFOLK SON: 22164

Dear RAHEEM ARIBARDAR:

The Massachusetts Sex Offender Registry Law requires that Level 3 offenders appear in-person annually (during the month of their birthday) at the local police department of the city or town in which they live, or, if not living in Massachusetts, in the city or town in which they work or attend an institution of higher learning ("local police department"). They are required to appear with the enclosed registration form to verify that the information on file remains true and accurate, as well as, to update their photographs and take fingerprints. As a Level 3 offender, you are directed to report to your local police department within five (5) calendar days of receiving this letter in order to comply with these requirements. Failure to report to the local police department, as directed, will result in criminal prosecution.

If you have registered during the current calendar year, you do not have to re-register during your birth month for this calendar year. All other registration requirements remain in effect, including the fee payment.

Please be advised that as a Level 3 offender:

- When verifying registration information, you are required to provide the local police department with two (2) forms of Independent Written Verification. Any two (2) of the following four (4) items serve as Independent Written Verification:
  - Rent or mortgage receipt;
  - Utility bill;
  - Bank or credit card statement;
  - Passport, driver's license, official photo identification issued by the registry of motor vehicles, or any other photo identification deemed acceptable by the police department.
- All Level 3 non-resident offenders are required to verify their registration information by appearing in-person at the local police department every 59 days.
- As a Level 3 offender, your registration information will be made available to the public upon request. In addition, your information will be subject to community notification and website dissemination.
- You are required to comply with all of the provisions of the Sex Offender Registry Law, M.G.L. c. 6, § 178C – 178Q. Your failure to comply with these provisions will result in criminal prosecution.
- You will be placed in violation of the law, criminally prosecuted and subject to reclassification if you knowingly:
  - Fail to register;
  - Fail to verify registration information;
  - Fail to provide notice of a change of address, employment or enrollment in an institution of higher learning (educational, vocational, professional or trade); or
  - Provide false information.

**PLEASE READ CAREFULLY:** You are advised that you must appear in person at your local police department, not less than 10 days prior to any changes in residence, employment or enrollment at an institution of higher learning. You are further advised that you are required to immediately notify the appropriate authorities of any other state in which you establish a residence, employment or enroll in an institution of higher learning. Failure to do so may subject you to criminal prosecution.

**INTERNATIONAL TRAVEL:** You are further advised that, in accordance with federal law, you must report any international travel to your registration official not less than 21 days prior to departure. Failure to do so may result in federal prosecution. Reporting travel does not authorize entry into your destination country. Contact the local embassy of your destination country prior to your departure to determine whether entry will be authorized upon your arrival.

If you have any questions, please call 1-800-93-MEGAN (936-3426) or refer to the Board's website at [www.mass.gov/sorb](http://www.mass.gov/sorb).

SEX OFFENDER REGISTRY BOARD

Encl. SOR Form 002B (10/10).

STATEMENT OF DELIVERY: THIS DOCUMENT AND ITS' ENCLOSURES WERE MAILED VIA 1ST CLASS USPS ON STATED DATE TO STATED ADDRESS BY THE SORB.

PG # 5

<b>SEX OFFENDER REGISTRATION FORM</b>		<b>PD INSTRUCTIONS</b> - Have registrant complete the form & sign. Attach photograph and fingerprint card. Submit to SORB PO Box 1547, Salem, MA 01970.	
<small>Unclassified &amp; Level 1 Mail to: SORB PO Box 1547, Salem, MA 01970 Level 2 &amp; Level 3 Register at Police Department in City/Town of Residence</small>			
<b>SECTION A - Type Status:</b>		<b>SECTION B - Contributing Police Department/Agency Information:</b>	
<input checked="" type="checkbox"/> Unclassified (Mail to SORB) <input checked="" type="checkbox"/> Level 1 (Mail to SORB) <input checked="" type="checkbox"/> Level 2 (APD) <input checked="" type="checkbox"/> Level 3 (APD) <input checked="" type="checkbox"/> SORB CARD - SON 22164	<b>FD or Agency Name:</b> <b>Reporting Officer/Person:</b> _____ <b>Tel#:</b> _____		
<b>SECTION C - Registrant Information (Please print legibly or type):</b>		<b>Name:</b> Abubardar Raheem Rasheed <b>SSN:</b> 241-21-0348 <b>Allen #:</b> _____ <b>Other Name(s) Used:</b> Joe Nathan Jones <b>DOB:</b> 10 23 1962 <b>POB:</b> Goldsboro NC <b>Race:</b> Black <b>Sex:</b> Male <b>Hair Color:</b> Black <b>Eye Color:</b> Brown <b>Height:</b> 6' 1/2 " <b>Weight:</b> 250Lbs <b>Scars/Marks/Tattoos:</b> Non <b>Driver's License or ID#:</b> S95174511 <b>N/A:</b> N/A	
<b>Are You Registered as a Sex Offender in Another State? [NO] <input checked="" type="checkbox"/> YES <input ]="" _____="" _____<="" and="" at="" b="" if="" level="" state="" type="checkbox" what="" which="" yes,=""/> </b>			
<b>SECTION D - Current Residency Address (Confirms with 2 lines of verification):</b>		<b>Secondary OR Out of State Address (if different than Residence)</b> <b>Street Address:</b> 9 Joseph Street <b>District/City:</b> MA 02124	
<b>Street Address:</b> 724 Shawmut, Ave. <small>NOTE: PO Box is not acceptable.</small> <b>Roxbury, MA 02119</b> <b>(857) 230-2842</b> <b>EMAIL ADDRESS:</b> josephjones@aol.com		<small>This Address Is Temporary Due To Being Shot In Both Legs See Attached Police Reports Exhibits# A, A1, A2 and A3.</small> <input type="checkbox"/> Homeless (Must register every 30 days) <b>Location and/or Address:</b> <small>NOTE: PO Box is not acceptable.</small>	
<b>Mailing Address:</b> <small>(if different from residence, temporary address, or homeless location)</small> <b>Address:</b> 9 Joseph Street <b>District/City:</b> MA, 02124		<b>Shelter Name (if applicable):</b> _____ <b>Closest Living Relative:</b> <b>Name:</b> _____ <b>Relationship:</b> _____ <b>Address:</b> _____	
<b>Licent Plate #:</b> _____ <b>State:</b> _____ <b>Expiration Year:</b> _____ <b>VIN#:</b> _____			
<b>SECTION E - Employment:</b> <input type="checkbox"/> Employed <input type="checkbox"/> Self-Employed <input checked="" type="checkbox"/> Unemployed <input type="checkbox"/> Volunteer <b>Employer:</b> _____ <b>Occupation:</b> _____ <b>Telephone Number:</b> _____			
<b>SECTION F - Institution of Higher Learning</b> <b>Start Date:</b> _____ <b>Ending Date:</b> _____ <b>Name:</b> NO <b>Campus:</b> _____ <b>Address:</b> _____			
<b>SECTION H - Please Read Carefully Before Signing</b> - You are advised that you must notify, in writing, the Sex Offender Registry Board and/or the Police Department in the city or town in which you reside not less than 10 days prior to any change in residence, employment, or attendance at an institution of higher learning. You are required to immediately contact and advise of your presence, the appropriate authorities in any other state in which you locate yourself for the purpose of residence, employment, or attendance at an institution of higher learning. In accordance with federal law, you must report any international travel to your registering authority no less than 21 days prior to travel. Failing to do any of the above may subject you to state or federal criminal prosecution.			
<input checked="" type="checkbox"/> I have read and understand the above requirements, OR <input type="checkbox"/> the requirements were read to me and I understand these requirements. I do hereby attest that the information I have provided is true and accurate. Signed, this date: <u>October 23, 2018</u> , under the pains and penalties of perjury. <b>DATE:</b> _____			
<u>21/10/2018</u> / <u>S. R. A.</u> / <u>Raheem R. Abubardar</u> <p style="text-align: center;">pg. ff 6</p>			

**SORNA COMPLIANCE FORM**

Pursuant to the Sex Offender Registry Notification Act (SORNA),  
Please provide the following information

**TRAVEL DOCUMENTS**

**Section 1- PLEASE PRINT CLEARLY**

Please provide the following personal identifying information:

Name: Abubardar \_\_\_\_\_ Raheem \_\_\_\_\_  
(Last) (First)

Date of Birth: 10 / 23 / 1962  
Month Day Year  
22164

Sex Offender Number: \_\_\_\_\_

**Section 2- PLEASE PRINT CLEARLY**

Please provide the following information if applicable:

Passport Number: \_\_\_\_\_  I do not have a passport

Immigration Number: \_\_\_\_\_  I do not have an immigration number

Travel Itinerary: Please attach any international travel information including departure and return dates, destination and addresses that you will be staying at, and flight, train or bus tickets.

\*In addition please include a photocopy of your passport.

**OTHER IDENTIFICATION**

**Section 3- PLEASE PRINT CLEARLY**

Please provide the following internet identifying information if applicable:

Email Address: josephjones@adl.com

Social Media Usernames (Facebook Twitter or other networking profile): \_\_\_\_\_

**THIS IS NOT YOUR REGISTRATION FORM.** This information is used in order to comply with the Sex Offender Registry Notification Act of the Adam Walsh Act.

Pursuant to the federal Sex Offender Registration Notification Act, you must provide the Sex Offender Registry Board with travel document information including passport, immigration visa numbers, and if and when you travel out of state or country, for work or vacation, you must update the Sex Offender Registry Board with a travel itinerary.

You are further advised that, in accordance with federal law, you must report any international travel to your registration official not less than 21 days prior to departure. Failure to do so may result in federal prosecution. Reporting travel does not authorize entry into your destination country, contact the local embassy of your destination country prior to your departure to determine whether entry will be authorized upon your arrival.

Please sign on the line below:

Name: Raheem R. Abubardar

Date

October 22, 2018

Please return to the Sex Offender Registry, or mail to: ATTN: Registration, P.O. Box 4347, Salem, MA 01970.

*ggf/Z*

**Instructions for Completing the Sex Offender Registration Form**

**USE:** This form is to be used by the Sex Offender, Sex Offender Registry, and all agencies responsible for registering sexual offenders who are unclassified or have been classified by the Sex Offender Registry Board as Level 1, Level 2, Level 3, or if determined to be a Sexually Violent Predator. If necessary, use a separate piece of paper for additional information.

(Items 2, 3, 5, 6, & 7 in SECTION C below do not have to be completed by UNCLASSIFIED Offenders)

**SECTION A:** This section is used to record the SON & classification status. Check the appropriate box indicating the level the offender has been classified. Note to Police: This is verified by the Database (DB).

**SECTION B:** This section is used to record the name and contact number of the agency responsible for completing and submitting the registration form and identifying the person representing that agency who took the registration.

**SECTION C:** This section is used to record administrative, physical, and legal information about the registrant.

1. Name - The last, first and middle name of the registrant
2. SSN - The 9-digit social security number of the registrant, IIN's alien number, or passport number and country of issue
3. Other Name(s) Used - Legal name changes, nick names, or other names commonly used
4. DOB - record the registrant's date of birth numerically by month, day, and 4-digit year
5. POB - record the registrant's place of birth by city and state
6. Demographics - race, sex, hair color, eye color, height, and weight
7. Scars/Marks/Tattoos - record any scars, marks, or tattoos (including piercings) on the registrant's body
8. Driver's License or ID: record if different from the registrant's SSN. Identify the state of issues if not MA
9. Registered as a Sex Offender in another State - check the appropriate box. If yes, record the state and the risk level, if known. Note to Police: The III will also have information related to the registrant as registered as a sex offender in other states.

**SECTION D:** This section is used to record all addresses where the offender may live or receive mail. Also provides a name and address for their nearest relative. Use the reverse side of the form or additional pages to record additional addresses.

1. Current Residence Address - record the street number and name, apartment/lot/building number, city, county, state, and zip for the location where the registrant lives. **THIS CANNOT BE A POST OFFICE BOX**
2. Secondary or Out of State Address - record the street number and name, apartment/lot/building number, city, county, state, and zip for the location where the registrant lives on a temporary basis, to include vacations. **THIS CANNOT BE A POST OFFICE BOX**. Secondary address is defined as "the addresses of all places where a sex offender lives, abides, lodges, or resides for a period of 14 or more days in the aggregate during any calendar year and which is not a sex offender's primary address, or a place where a sex offender routinely lives, abides, lodges, or resides for a period of 4 or more consecutive or nonconsecutive days in any month and which is not a sex offender's permanent address, including any out-of-state address."
3. Mailing Address - record the post office or other mailbox number, the street number and name, apartment/lot/building number, city, county, state, and zip for the location where the registrant receives mail if other than his live address
4. HOMELESS, the registrant must provide the city and approximate location within that city. Provide Shelter name & address, if applicable. A mailing address is strongly suggested in the event SORB must communicate with the offender. Note to Police: This is the address that will be coded as "LIVE" in the DB.

**SECTION E:** This section is used to record the identification of any vehicle, mobile home, trailer, manufactured home, vessel, or houseboat owned or operated by the registrant. Use the reverse side of the form for additional items.

1. Closest Living Relative - Record the name, relationship, and address of the registrant's closest living relative for notification in case of emergency.

**SECTION F:** This section is used to record where the registrant works. Include the Employer name, address of employer, and telephone number. Occupation - record what type of work the registrant normally does (i.e. landscaper, teacher, bus driver, farmer, etc.)

**SECTION G:** This section is used to record where the registrant attends an Institution of Higher Learning. Include the name and address of the school, and campus if a satellite or extension. Include the enrollment start and end dates.

**SECTION H:** This section is used to advise the registrant of his legal obligations to notify the SORB or the police department of any changes in his registration status. The registrant must check that he understands his duties and sign the form. If registering at a law enforcement office, the officer witnessing the individual sign the form should sign in the space provided.

\* Acceptable forms of identification are: rent or mortgage receipt, utility bill, bank or credit card statement, passport, driver's license or official photo identification issued by the registry of motor vehicles.

- Unclassified & Level 1...Mail to: SORB PO Box 4547, Salem MA 01970
- Level 2 & Level 3...Register at Police Department in City/Town of Residence

PJ #8



*Executive Office of Public Safety and Security  
Sex Offender Registry Board*

P.O. Box 4547

Salem, Massachusetts 01970

Tel: (978) 740-5480, Fax: (978) 740-5454

[www.mass.gov/sorb](http://www.mass.gov/sorb)

DANIEL BENNETT

Secretary

KEVIN S. HAYDEN

Chairman

CHARLES D. BAKER

Governor

KATHY E. POLITO

Lieutenant Governor

RAMIEEL ABBURARIAH  
724 SHAWMUT AVE.  
ROXBURY, MA 02119

OCTOBER 01, 2018

County: SUFFOLK SON: 22164

Dear RAMIEEL ABBURARIAH:

The Massachusetts Sex Offender Registry Law requires that Level 3 offenders appear in person annually (during the month of their birthday) at the local police department of the city or town in which they live, or, if not living in Massachusetts, in the city or town in which they work or attend an institution of higher learning ("local police department"). They are required to enter with the residence registration form to verify that the information on file remains true and accurate, as well as, to update their photograph and take fingerprints. As a Level 3 offender, you are required to report to your local police department within five (5) calendar days of receiving this letter in order to comply with these requirements. Failure to do so, the local police department is directed to refer you to the

If you have registered during the current calendar year, you do not have to re-register during your birth month for this calendar year. All other registration requirements remain in effect, including the fee payment.

Please be advised that as a Level 3 offender:

- When verifying registration information, you are required to provide the local police department with two (2) forms of Independent Written Verification. Any two (2) of the following four (4) items serve as Independent Written Verification:
  - Rent or mortgage receipt
  - Utility bill
  - Bank or credit card statement
  - Passport, driver's license, official photo identification issued by the Registry of Motor Vehicles, or any other photo identification deemed acceptable by the police department.
- All Level 3 offenders are required to verify their registration information by appearing in-person at the local police department every 12 months.
- As a Level 3 offender, your registration information will be made available to the public upon request. In addition, your information will be subject to community notification and website dissemination.
- You are required to comply with all of the provisions of the Sex Offender Registry Law, M.G.L. c. 6, § 178C – 178Q. Your failure to comply with these provisions will result in criminal prosecution.
- You will be placed in violation of the law, criminally prosecuted and subject to reclassification if you knowingly:
  - Fail to register
  - Fail to verify registration information
  - Fail to provide notice of a change of address, employment or enrollment in an institution of higher learning (educational, vocational, professional or trade); or
  - Provide false information

**PLEASE READ CAREFULLY:** You are advised that you must appear in-person at your local police department, not less than 1G days prior to any change in residence, employment or enrollment at an institution of higher learning. You are further advised that you are required to immediately notify the appropriate authorities of any other state in which you establish a residence, employment or enroll in an institution of higher learning. Failure to do so may subject you to criminal prosecution.

**INTERNATIONAL TRAVEL:** You are further advised that, in accordance with federal law, you must report any international travel to your registration official not less than 21 days prior to departure. Failure to do so may result in federal prosecution. Reporting travel does not authorize entry into your destination country; contact the local embassy of your destination country prior to your departure to determine whether entry will be permitted upon your arrival.

If you have any questions, please call 1-800-93-MSCAN (936-3426) or refer to the Board's website at [www.mass.gov/sorb](http://www.mass.gov/sorb).

SEX OFFENDER REGISTRY BOARD

Enclosure: SOR Form 002R (10/10).

**STATEMENT OF DELIVERY: THIS DOCUMENT AND ITS ENCLOSURES WERE MAILED VIA 1<sup>ST</sup> CLASS USPS ON STATED DATE TO STATED ADDRESS BY THE SORB.**

92 #9

**Instructions for Completing the Sex Offender Registration Form**

**USE:** This form is to be used by the Sex Offender, Sex Offender Registry, and all agencies responsible for registering sexual offenders who are unclassified or have been classified by the Sex Offender Registry Board as Level 1, Level 2, Level 3, or if determined to be a Sexually Violent Predator. If necessary, use a separate piece of paper for additional information.  
(Items 2, 3, 5, 6, & 7 in SECTION C below do not have to be completed by UNCLASSIFIED Offenders)

**SECTION A:** This section is used to record the SON & classification status. Check the appropriate box indicating the level the offender has been classified. Note to Police: This is verified by the Database (DB).

**SECTION B:** This section is used to record the name and contact number of the agency responsible for completing and submitting the registration form and identifying the person representing that agency who took the registration.

**SECTION C:** The section is used to record administrative, physical, and legal information about the registrant.

1. Name - The last, first and middle name of the registrant
2. SSN - The 9-digit social security number of the registrant, DVS alien number, or passport number and country of issue
3. Other Name(s) Used - Legal name changes, nick names, or other names commonly used.
4. DOB - record the registrant's date of birth numerically by month, day, and 4-digit year.
5. POB - record the registrant's place of birth by city and state.
6. Demographics- race, sex, hair color, eye color, height, and weight
7. Scars/Marks/Tattoos - record any scars, marks, or tattoos (including piercings) on the registrant's body.
8. Driver's License or ID: record if different from the registrant's SSN. Identify the state of issues if not MA.
9. Registered as a Sex Offender in another State - check the appropriate box. If yes, record the state and the risk level, if known.

Note to Police: The III will also have information related to the registrant as registered as a sex offender in other states.

**SECTION D:** This section is used to record all addresses where the offender may live or receive mail. Also provides a name and address for their nearest relative. Use the reverse side of the form or additional pages to record additional addresses.

1. Current Residence Address - record the street number and name, apartment/lot/building number, city, county, state, and zip for the location where the registrant lives. THIS CANNOT BE A POST OFFICE BOX.
2. Secondary or Out of State Address - record the street number and name, apartment/lot/building number, city, county, state, and zip for the location where the registrant lives on a temporary basis, to include vacations. THIS CANNOT BE A POST OFFICE BOX. Secondary address is defined as "the addresses of all places where a sex offender lives, abides, lodges, or resides for a period of 14 or more days in the aggregate during any calendar year and which is not a sex offender's primary address; or a place where a sex offender routinely lives, abides, lodges, or resides for a period of 4 or more consecutive or nonconsecutive days in any month and which is not a sex offender's permanent address, including any out-of-state address."
3. Mailing Address - record the post office or other mailbox number, the street number and name, apartment/lot/building number, city, county, state, and zip for the location where the registrant receives mail if other than his live address.
4. HOMELESS, the registrant must provide the city and approximate location within that city. Provide Shelter name & address, if applicable. A mailing address is strongly suggested in the event SORB must communicate with the offender. Note to Police: This is the address that will be coded as "LIVP" in the DB.

**SECTION E:** This section is used to record the identification of any vehicle, mobile home, trailer, manufactured home, vessel, or houseboat owned or operated by the registrant. Use the reverse side of the form for additional items.

1. Closest Living Relative - Record the name, relationship, and address of the registrant's closest living relative for notification in case of emergency.

**SECTION F:** This section is used to record where the registrant works. Include the Employer name, address of employer, and telephone number. Occupation - record what type of work the registrant normally does (i.e. landscaper, teacher, bus driver, farmer, etc.)

**SECTION G:** This section is used to record where the registrant attends an Institution of Higher Learning. Include the name and address of the school, and campus if a satellite or extension. Include the enrollment start and end dates.

**SECTION H:** This section is used to advise the registrant of his legal obligations to notify the SORB or the police department of any changes in his registration status. The registrant must check that he understands his duties and sign the form. If registering at a law enforcement office, the officer witnessing the individual sign the form should sign in the space provided.

\* Acceptable forms of identification are: rent or mortgage receipt, utility bill, bank or credit card statement, passport, drivers' license or official photo identification issued by the registry of motor vehicles.

- Unclassified & Level 1...Mail to: SORB PO Box 4547, Salem MA 01970
- Level 2 & Level 3...Register at Police Department in City/Town of Residence

92 ff 10

# EXHIBIT B

<b>CRIMINAL COMPLAINT ORIGINAL</b>		DOCKET NUMBER 1801CR001484	NO. OF COUNTS 1	<b>Trial Court of Massachusetts BMC Department</b>
DEFENDANT NAME & ADDRESS Raheem R Abubardar 724 Shawmut Ave Boston, MA 02119				COURT NAME & ADDRESS BMC Central 24 New Chardon Street, 6th Floor Boston, MA 02114 (617)788-8600
DEFENDANT DOB 10/23/1962	COMPLAINT ISSUED 03/26/2019	DATE OF OFFENSE 03/15/2019	ARREST DATE	
OFFENSE CITY / TOWN Boston	OFFENSE ADDRESS 40 New Sudbury St			NEXT EVENT DATE & TIME
POLICE DEPARTMENT Boston PD - Area B-2	POLICE INCIDENT NUMBER 192021908			NEXT SCHEDULED EVENT
OBTN	PCF NUMBER 526245	DEFENDANT XREF ID 5152620		ROOM / SESSION

The undersigned complainant, on behalf of the Commonwealth, on oath complains that on the date(s) indicated below the defendant committed the offense(s) listed below and on any attached pages.

*Subsequent portion of offense dismissed*

COUNT	CODE	DESCRIPTION
1	6/178H/G	SEX OFFENDER FAIL TO REGISTER, SUBSQ. OFF., LEVEL 2 OR 3 TO §178H(a)(2)

On 03/15/2019, being a sex offender, as defined in G.L. c.6, §178C, who had been classified as a Level 2 or Level 3 sex offender by the Sex Offender Registry Board pursuant to §178K, and who was required to register pursuant to G.L. c.6, §§ 178C-178P: (1) did knowingly fail to register; or (2) did knowingly fail to verify registration information; or (3) did knowingly fail to provide notice of a change of address; or (4) did knowingly provide false information, the defendant having previously been convicted of such an offense, in violation of G.L. c.6, §178H(a)(2).

NO DISTRICT COURT FINAL JURISDICTION IN ADULT SESSION.

*Conn, J* MAY 21 2019

SIGNATURE OF COMPLAINANT <i>[Signature]</i>	SWORN TO BEFORE CLERK-MAGISTRATE/ASST. CLERK/DEP. ASST. CLERK <i>Benjamin Flynn</i>	DATE MAR 25 2019
NAME OF COMPLAINANT <i>[Signature]</i>	AT TRUE COPY ATTEST <i>X</i>	CLERK-MAGISTRATE/ASST. CLERK <i>X</i>
		DATE

**Notice to Defendant:** 42 U.S.C. § 3796gg-4(e) requires this notice: If you are convicted of a misdemeanor crime of domestic violence you may be prohibited permanently from purchasing and/or possessing a firearm and/or ammunition pursuant to 18 U.S.C. § 922 (g) (9) and other applicable related Federal, State, or local laws.

<b>APPLICATION FOR CRIMINAL COMPLAINT</b>		APPLICATION NO. (COURT USE ONLY) <b>19CR-1484</b>	PAGE <b>1 of 1</b>	<b>Trial Court of Massachusetts BOSTON MUNICIPAL COURT</b>	
<p>I, the undersigned complainant, request that a criminal complaint issue against the accused charging the offense(s) listed below. If the accused HAS NOT BEEN ARRESTED and the charges involve:</p> <p><input type="checkbox"/> ONLY MISDEMEANOR(S), I request a hearing <input type="checkbox"/> WITHOUT NOTICE, because of an imminent threat of  <input type="checkbox"/> BODILY INJURY <input type="checkbox"/> COMMISSION OF A CRIME <input type="checkbox"/> FLIGHT <input type="checkbox"/> WITH NOTICE to accused  <input checked="" type="checkbox"/> ONE OR MORE FELONIES, I request a hearing <input checked="" type="checkbox"/> WITHOUT NOTICE <input type="checkbox"/> WITH NOTICE to accused</p> <p><input checked="" type="checkbox"/> WARRANT is requested because prosecutor represents that accused may not appear unless arrested.</p>					
				<b>ARREST STATUS OF ACCUSED</b> <input type="checkbox"/> HAS <input checked="" type="checkbox"/> HAS NOT been arrested	
<b>INFORMATION ABOUT ACCUSED</b>					
NAME (FIRST MI LAST) AND ADDRESS  <b>ABUBARDAR, RAHEEM R</b> 724 SHANNON AVE BOSTON, MA 02119		BIRTH DATE <b>10/23/1962</b>	SOCIAL SECURITY NUMBER <b>246210348</b>		
		PCP NO. <b>526245</b>	MARITAL STATUS		
		DRIVERS LICENSE NO.			STATE
		GENDER <b>MALE</b>	HEIGHT <b>602</b>	WEIGHT <b>220</b>	EYES <b>BROWN</b>
HAIR <b>Black</b>	RACE <b>BLACK</b>	COMPLEXION	SCARS/MARKS/TATTOOS	BIRTH STATE OR COUNTRY <b>NC</b>	
DAY PHONE					
EMPLOYER/SCHOOL		MOTHER'S MAIDEN NAME (FIRST MI LAST)		FATHER'S NAME (FIRST MI LAST) <b>JOHNNY, JOE</b>	
<b>CASE INFORMATION</b>					
COMPLAINANT NAME (FIRST MI LAST)  <b>HENRIQUEZ, ISMAEL</b>  ADDRESS    ONE SCHROEDER PLAZA BOSTON, MA 02120		COMPLAINANT TYPE <input checked="" type="checkbox"/> POLICE <input type="checkbox"/> CITIZEN <input type="checkbox"/> OTHER		PD <b>BOSTON POLI</b>	
		PLACE OF OFFENSE <b>40 NEW SUDSBURY ST, BOSTON, MA 02114</b>			
		INCIDENT REPORT NO. <b>192021908</b>	OBTN		
		CITATION NO(S). <b>XXXXX</b>			
OFFENSE CODE <b>6/178H/G</b>	DESCRIPTION <b>SEX OFFENDER FAIL TO REGISTER, SUBSQ. OFF., LEVEL 2 OR 3 c6 S178H(a)</b>			OFFENSE DATE <b>03/15/2019</b>	
1 VARIABLES (e.g. victim name, controlled substance, type and value of property, other variable information; see Complaint Language Manual) <b>03/15/2019 (DATE OF OFFENSE)</b>					
OFFENSE CODE	DESCRIPTION			OFFENSE DATE	
2 VARIABLES					
OFFENSE CODE	DESCRIPTION			OFFENSE DATE	
3 VARIABLES					
REMARKS		COMPLAINANT'S SIGNATURE <b>X</b>	DATE FILED <b>3/26/19</b>		
COURT USE ONLY	A HEARING UPON THIS COMPLAINT APPLICATION WILL BE HELD AT THE ABOVE COURT ADDRESS ON		DATE OF HEARING	TIME OF HEARING	
DATE	PROCESSING OF NON-ARREST APPLICATION (COURT USE ONLY)			CLERK/JUDGE	
	NOTICE SENT OF CLERK'S HEARING SCHEDULED ON:				
	NOTICE SENT OF JUDGE'S HEARING SCHEDULED ON:				
	HEARING CONTINUED TO:				
	APPLICATION DECIDED WITHOUT NOTICE TO ACCUSED BECAUSE: <input type="checkbox"/> IMMINENT THREAT OF <input type="checkbox"/> BODILY INJURY <input type="checkbox"/> CRIME <input type="checkbox"/> FLIGHT BY ACCUSED <input type="checkbox"/> FELONY CHARGED AND POLICE DO NOT REQUEST NOTICE <input type="checkbox"/> FELONY CHARGED BY CIVILIAN; NO NOTICE AT CLERK'S DISCRETION				
DATE <b>3-26-19</b> <b>DNC</b>	COMPLAINT TO ISSUE <input checked="" type="checkbox"/> PROBABLE CAUSE FOUND FOR ABOVE OFFENSE(S) NO(S). <input checked="" type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. BASED ON <input checked="" type="checkbox"/> FACTS SET FORTH IN ATTACHED STATEMENT(S) <input type="checkbox"/> TESTIMONY RECORDED: TAPE NO. START NO. _____ END NO. _____ <input checked="" type="checkbox"/> WARRANT <input type="checkbox"/> SUMMONS TO ISSUE ARRAIGNMENT DATE: _____	COMPLAINT DENIED <input type="checkbox"/> NO PROBABLE CAUSE FOUND <input type="checkbox"/> REQUEST OF COMPLAINANT <input type="checkbox"/> FAILURE TO PROSECUTE <input type="checkbox"/> AGREEMENT OF BOTH PARTIES <input type="checkbox"/> OTHER: COMMENT <i>Det. Ismael Appears Satisifed to file</i>	CLERK/JUDGE <b>B-Nm 2 AC</b>		

# Incident Report



Case Number I192021908	CAD Incident # P190143581
Report Type Incident Report	Page 1 of 4
Date / Time Occurred 03/25/2019 14:59 to	Date / Time Reported 03/25/2019 14:59

Arrested Suspects	Additional Suspects	Unknown Suspects	Victims	Other Persons	Vehicles	Items	Evidence Count	Leads Count	File #
<input type="checkbox"/> Drugs	<input type="checkbox"/> DVIP	<input type="checkbox"/> Juvenile	<input type="checkbox"/> Child Present	<input type="checkbox"/> Elderly	<input type="checkbox"/> Sexual Assault				
<input type="checkbox"/> CRU - Hate/Bias	<input type="checkbox"/> Licensed Premise	<input type="checkbox"/> Disabled	<input type="checkbox"/> Homeland Security	<input type="checkbox"/> Homeland Security - UASI	<input type="checkbox"/> Home Invasion				
<input type="checkbox"/> Car Jack	<input type="checkbox"/> Gun	<input type="checkbox"/> Gang	<input type="checkbox"/> Shots Fired	<input type="checkbox"/> Victim Shot	<input type="checkbox"/> Victim Stabbed				
<input type="checkbox"/> Other Agency/Unit Notified	<input type="checkbox"/> Warrant Arrest	<input type="checkbox"/> Search Warrant	<input type="checkbox"/> Licensed Premise Violation	<input type="checkbox"/> LPR	<input type="checkbox"/> Human Trafficking				
<input type="checkbox"/> Bicycle	<input type="checkbox"/> School	<input type="checkbox"/> Homeless	<input checked="" type="checkbox"/> Sex Offender	<input type="checkbox"/> NIDV	<input type="checkbox"/> Child Abuse				

Incident Details	
Unit Number	Clearance Disposition
	<input type="checkbox"/> Cleared by Exception

Situation Found	Case Status
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Location Given By Dispatcher

Incident Address

Street Address  
40 NEW SUDSBURY ST

City BOSTN	State MASSACHUSETTS	Zip 02114	District DISTRICT B2
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Administrative Info

Reporting Officer HENRIQUEZ, ISMAEL	Employee Number 091894	Approving Supervisor HUGHES, JOHN
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**OFFENSE**

Upgrade/Downgrade Offense      Upgrade/Downgrade Offense Code

Primary Offense      Crime Description  
FAILURE TO REGISTER AS A SEX OFFENDER

Offense Code Value 01721	Attempted/Completed	Premise Type
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Circumstances	Bias
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Criminal Activity 1	Criminal Activity 2	Criminal Activity 3
---------------------	---------------------	---------------------

Offender Using 1	Offender Using 2	Offender Using 3
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# Premise Entered	Home Invasion	Domestic Violence	Gang Activity
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Gang Type #1	Gang Name #1		
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Gang Type #2	Gang Name #2		
--------------	--------------	--	--

Drug Related	Drug Type	Drug Origin	Drug Precursors
--------------	-----------	-------------	-----------------

MO Panel	Entry Type	Entry Area	Entry Method
----------	------------	------------	--------------

Entry Point 1	Entry Point 2	Exit Point 1
---------------	---------------	--------------

Exit Point 2	Target Area	Property Target 1
--------------	-------------	-------------------

Property Target 2	Property Target 3	Victim Target
-------------------	-------------------	---------------

Time of Day	Victim Activity	Action 1 to Premises
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Action 2 to Premises	Action 3 to Premises	Action 1 on Victim
----------------------	----------------------	--------------------

Action 2 on Victim	Action 3 on Victim	Other Action 1
--------------------	--------------------	----------------

Other Action 2	Other Action 3	Solicited Offered 1
----------------	----------------	---------------------

Solicited Offered 2	Solicited Offered 3	Weapon 1
---------------------	---------------------	----------

Weapon 1 Auto	Weapon 2	Weapon 2 Auto
---------------	----------	---------------

Weapon 3	Weapon 3 Auto	Arson
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# Incident Report



Case Number I192021908	CAD Incident # P190143681
Report Type Incident Report	Page 2 of 4
Date / Time Occurred 03/25/2019 14:59 to	Date / Time Reported 03/25/2019 14:59

Precipitating Circumstance	Instrument Used
Unusual Actions and Statements of Suspect	

SUSPECT	<input checked="" type="checkbox"/> Known <input type="checkbox"/> Unknown <input type="checkbox"/> Arrested						
Name (Last, First Middle) <b>ABUBARDAR, RAHEEM RASHEED</b>							
Prefix	Nickname	Race	Gender	SSN	Date of Birth	Age	Age Range
		Black	Male	246-21-0348	10/23/1982	56	to
Height 6'02"	Weight 220	Driver's License #	DL State	Local ID	SID		
FBI #	SBI #	Place of Birth			Citizenship		
Ethnicity		Marital Status					
Preferred	Contact #1	Contact #2	Email Address				
Suspect Home Address							
Street Address <b>724 SHAWMUT AVE</b>		City BOSTN	State MASSACHUSETTS	Zip 02119	Suspect Employment Information		
<input type="checkbox"/> Student	Employer / School		Occupation				
Street Address							
City	State	Zip	Work Phone	Hours of Employment			
Hair Color	Hair Length	<input type="checkbox"/> Glasses	Eye Color	Build	Facial Hair	Facial Hair Color	
Voice	Complexion	Hand Preference					
Clothing Description							
Trademarks of Suspect							
Injury 1	Injury 2	Injury 3	Injury 4	Injury 5			
<input type="checkbox"/> Hospitalized	Hospital Facility		Resident				
MO Panel							
Entry Type	Entry Area			Entry Method			
Entry Point	Exit Point			Target Area			
Property Target 1	Property Target 2			Property Target 3			
Victim Target	Time of Day			Victim Activity			
Action 1 on Victim	Action 2 on Victim			Action 3 on Victim			
Action 1 to Premises	Action 2 to Premises			Action 3 to Premises			
Other Action 1	Other Action 2			Other Action 3			
Solicited Offered 1	Solicited Offered 2			Solicited Offered 3			
Weapon 1	Weapon 2			Weapon 3			
Weapon 1 Type	Weapon 2 Type			Weapon 3 Type			
Weapon 1 Caliber	Weapon 2 Caliber			Weapon 3 Caliber			

# Incident Report



Case Number I19021908	CAD Incident # P190143881
Report Type Incident Report	Page 3 of 4
Date / Time Occurred 03/25/2019 14:59 to	Date / Time Reported 03/25/2019 14:59

Weapon 1 Color	Weapon 2 Color	Weapon 3 Color							
Arson	Precipitating Circumstance	Instrument Used							
Comments									
Associated Offenses									
<input type="checkbox"/> Associated With Suspect									
<b>FAILURE TO REGISTER AS A SEX OFFENDER</b>									
VICTIM	Victim Type Society								
Name (Last, First Middle) <b>COMM OF MASS</b>									
Suffix	Nickname	Race	Gender	SSN	Date of Birth	Age	Age Range to		
Infant Type	Height	Weight	Driver's License #	DL State					
Place of Birth		Citizenship							
Ethnicity	Marital Status								
Preferred	Contact #1	Contact #2	Email Address						
Victim Home Address									
Street Address <b>2400 WASHINGTON ST</b>									
City BOSTN	State MASSACHUSETTS	Zip 02119	Employment Information						
<input type="checkbox"/> Student	Employer / School		Occupation						
College Name	On Campus <input type="checkbox"/> Yes <input type="checkbox"/> No								
Street Address									
City	State	Zip	Work Phone		Hours of Employment				
Details									
Hair Color	Eye Color	Build	Resident						
Injury 1 Injury Description									
Injury 2	Injury 3	Injury 4	Injury 5						
Victim Condition				Victim-Offender					
<input type="checkbox"/> A. Assault/Homicide <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> A. Assault/Homicide Circumstance 1		<input type="checkbox"/> A. Assault/Homicide Circumstance 2					
<input type="checkbox"/> Justifiable Homicide <input type="checkbox"/> Yes <input type="checkbox"/> No		Justifiable Homicide Circumstance							
<input type="checkbox"/> Victim Hospitalized				Hospital Facility Hospital Description					
<input type="checkbox"/> Under Influence Alcohol? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown			<input type="checkbox"/> Under Influence Drugs? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown			Domestic Disturbance		Domestic Violence Victim Transported <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Violation of Protective Order <input type="checkbox"/> Yes <input type="checkbox"/> No			<input type="checkbox"/> Cohabiant <input type="checkbox"/> Yes <input type="checkbox"/> No						
Associated Offenses									
<input type="checkbox"/> Associated With Victim									
<b>FAILURE TO REGISTER AS A SEX OFFENDER</b>									

Public Narrative

## Incident Report



Case Number I192021908	CAD Incident # P190143681
Report Type Incident Report	Page 4 of 4
Date / Time Occurred 03/25/2019 14:59 to	Date / Time Reported 03/25/2019 14:59

On 03/15/2019, Raheem ABUBARDAR with a date of birth of 10/23/1962, being a Sex Offender, as defined in G.L. c. 6, § 178C, who was required to register pursuant to G.L. c. 6§ 178C-178Q; (1) did knowingly fail to register; or (2) did knowingly fail to verify registration information; or (3) did knowingly fail to provide notice of a change of address; or (4) did knowingly provide false information, the defendant having previously been convicted in Plymouth Superior Court on 09/06/1991 of an offense, specifically, Rape, Docket #89868.

Being a convicted level 3 sex offender, Mr. ABUBARDAR did fail to register with the Boston Police Sex Offender Registry Unit (SORI Unit) as of 03/25/2019. Mr. ABUBARDAR failed to notify the SORI Unit of a change of address per address audit by detectives. Mr. ABUBARDAR was placed in violation for not registering as a sex offender.

Warrants to be sought out of Boston Municipal Court, Central Division for Failure to register as a sex offender, second and subsequent, as suspect was convicted on 02/01/2017 out of Plymouth Superior Court for failure to register as a sex offender, docket # 201300192006.

# EXHIBIT C

7/1/2020

Case Details - Massachusetts Trial Court 4

[Skip to main content](#)**1901CR001484 Commonwealth vs. Abubardar, Raheem Rasheed**

- Case Type  
Criminal
- Case Status  
Activity Suspended
- File Date  
03/26/2019
- DCM Track:
- Initiating Action:  
SEX OFFENDER FAIL TO REGISTER, LEVEL 2 OR 3 c6 §178H(a)(1)
- Status Date:  
12/10/2019
- Case Judge:
- Next Event:

[All Information](#) | [Party](#) | [Charge](#) | [Event](#) | [Docket](#) | [Disposition](#)
**Party Information**

Abubardar, Raheem Rasheed  
- Defendant

Alias

## Party Attorney

- Attorney
- Carroll, Esq., Bruce W
- Bar Code
- 075840
- Address
- Phone Number

[More Party Information](#)**Party Charge Information**

- Abubardar, Raheem Rasheed  
- Defendant
- Charge # 1 :  
6/178H/E - Felony    SEX OFFENDER FAIL TO REGISTER, LEVEL 2 OR 3 c6 §178H(a)(1)
- Original Charge
- 6/178H/G SEX OFFENDER FAIL TO REGISTER, SUBSQ. OFF., LEVEL 2 OR  
3 c6 §178H(a)(2) (Felony)
- Amended Charge
- 6/178H/E SEX OFFENDER FAIL TO REGISTER, LEVEL 2 OR 3 c6 §178H(a)  
(1) (Felony)

## Charge Disposition

Disposition Date

Disposition

12/10/2019

Nolle Prosequi

**Events**

Date	Session	Location	Type	Event Judge	Result
03/29/2019 09:00 AM	Arraignment - Rm 17, 5th Flr	BOS-5th FL, CR 17	Default Removal Hearing (BMC)		Held
05/21/2019 09:00 AM	Arraignment - Rm 17, 5th Flr	BOS-5th FL, CR 17	Probable Cause Hearing (BMC)		Defendant defaulted-FI to Appear

7/1/2020

## Case Details - Massachusetts Trial Court 4

<u>Date</u>	<u>Session</u>	<u>Location</u>	<u>Type</u>	<u>Event Judge</u>	<u>Result</u>
05/21/2019 09:00 AM	Arraignment - Rm 17, 5th Flr	BOS-5th FL, CR 17 (BMC)	Default Removal Hearing		
05/29/2019 09:00 AM	Pre-Trial - Courtroom 14, 5th Flr		Motion Hearing (CR)		Held - Motion allowed
06/04/2019 10:00 AM	Videoconference-Courtroom 13, 5th Floor	BOS-5th FL, CR 13 (BMC)	Motion Hearing (CR)		Event Cancelled
06/14/2019 09:00 AM	Pre-Trial - Courtroom 14, 5th Flr		Pretrial Hearing		Not Held
07/24/2019 09:00 AM	Pre-Trial - Courtroom 14, 5th Flr		Pretrial Hearing		Held
09/20/2019 09:00 AM	Pre-Trial - Courtroom 14, 5th Flr		Pretrial Hearing		Held
12/10/2019 09:00 AM	Pre-Trial - Courtroom 14, 5th Flr		Discovery Compliance & Jury Election		Defendant defaulted-Fl to Appear
12/30/2019 09:00 AM	Arraignment - Rm 17, 5th Flr	BOS-5th FL, CR 17 (BMC)	Hearing to Review Status		Review Completed

## Docket Information

<u>Docket Date</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>File Ref</u>	<u>Image Avail. Nbr.</u>
03/26/2019	Criminal Complaint issued from Electronic Application: Originating Court: BMC Central Case Number: 1901AC001630-WA Receiving Court: BMC Central			
03/26/2019	Complaint issued with arrest warrant.			
03/26/2019	Warrant Issued: Straight Warrant issued on 03/26/2019 for Abubardar, Raheem Rasheed			
03/26/2019	Complaint/Police Report			
03/29/2019	Called ahead at the request of Defendant to remove warrant			
03/29/2019	Participants at Court Event - Defendant In Court - Assistant District Attorney Fisher-Groban - Probation Representative Rodriguez - Session Clerk - cmt/kn - Courtroom and Time - 17 12.25. atty Carroll appt			
03/29/2019	Warrant recalled: Straight Warrant cancelled on 03/29/2019 for Abubardar, Raheem Rasheed			
03/29/2019	Event Resulted: Default Removal Hearing scheduled on: 03/29/2019 09:00 AM Has been: Held Hon. Lisa Grant, Presiding Appeared: Staff:			
03/29/2019	Bail revocation warning (276/58) given to the defendant  Judge: Grant, Hon. Lisa			
03/29/2019	Read only  Judge: Grant, Hon. Lisa			
03/29/2019	Defendant before Court on Warrant, Warrant recalled as served.  Judge: Grant, Hon. Lisa			
03/29/2019	Default warrant recall fee waived.  Judge: Grant, Hon. Lisa			
03/29/2019	Released on Personal Recognizance  Judge: Grant, Hon. Lisa			

7/1/2020

Case Details - Massachusetts Trial Court 4

Docket Date	Docket Text	Amount Owed	File Ref	Image Nbr.
03/29/2019	Appearance filed On this date Bruce W Carroll, Esq. added as Appointed - Able to Contribute for Defendant Raheem Rasheed Abubardar Appearance filed for the purpose of Case in Chief by Judge Hon. Lisa Grant.			1
05/21/2019	Event Resulted: Probable Cause Hearing scheduled on: 05/21/2019 09:00 AM Has been: Defendant defaulted-Fl to Appear Hon. Michael J Coyne, Presiding			
05/21/2019	Participants at Court Event - Defendant Not In Court - Assistant District Attorney Aiello - Probation Representative Chin - Session Clerk - KWS - Courtroom and Time - Rm 17/9:25. Atty Carroll appears			
05/21/2019	Default Warrant ordered to Issue. Judge: Coyne, Hon. Michael J			2
05/21/2019	Warrant recalled: Default Warrant cancelled on 05/21/2019 for Abubardar, Raheem Rasheed			
05/21/2019	Motion to amend offense to sex offender failure to register level two or three ALLOWED.			
05/21/2019	Warrant recalled: Default Warrant cancelled on 05/21/2019 for Abubardar, Raheem Rasheed			
05/21/2019	Participants at Court Event - Defendant In Court - Assistant District Attorney Aiello - Probation Representative Chin - Session Clerk - KWS - Courtroom and Time - RM 17/. attorney not present			
	Judge: Byrne, Hon. Catherine K			
05/21/2019	Default warrant recall fee waived.  Judge: Byrne, Hon. Catherine K			
05/21/2019	The Court enters the following order: attorney Carroll to remain appointed.  Judge: Byrne, Hon. Catherine K			
05/21/2019	Released on Personal Recognizance to June 14 Rm 14 for pretrial hearing.  Judge: Byrne, Hon. Catherine K			
05/21/2019	Defendant's request for speedy trial filed. Deft is now at Nashua street jail			3
05/21/2019	Habeas Corpus for prosecution issued to Suffolk County Jail returnable for 06/14/2019 09:00 AM Pretrial Hearing: Further Orders:			
05/29/2019	Defendant's motion to remove Default filed with the following, if any, supporting documents:			4
05/29/2019	Event Resulted: Motion Hearing (CR) scheduled on: 05/29/2019 09:00 AM Has been: Held - Motion allowed Hon. Richard Sinnott, Presiding			
05/29/2019	Motion to continue ALLOWED.			
05/29/2019	Participants at Court Event - Defendant Not in Court - Assistant District Attorney Aiello - Probation Representative Sweeney - Session Clerk - KWS - Courtroom and Time - 14, 10:53. Atty Carroll appears			
	Judge: Sinnott, Hon. Richard			
05/29/2019	Event Resulted: Pretrial Hearing scheduled on: 06/14/2019 09:00 AM Has been: Not Held Hon. Richard Sinnott, Presiding			
05/29/2019	Habeas Corpus for prosecution issued to Suffolk County Jail returnable for 07/24/2019 09:00 AM Pretrial Hearing: Further Orders: this HABE replaces HBE issued for June 14, 2019			
	Judge: Sinnott, Hon. Richard			
05/30/2019	SORB record deposited with clerk-magistrate (G.L. c.233 §79J).			
05/31/2019	Event Resulted: Motion Hearing (CR) scheduled on: 06/04/2019 10:00 AM Has been: Event Cancelled For the following reason: Defendant Not Present Kathleen T Noons, Presiding			

7/1/2020

Case Details - Massachusetts Trial Court 4

Docket Date	Docket Text	Amount Owed	File Ref	Image Avail. Nbr.
07/24/2019	Event Resulted: Pretrial Hearing scheduled on: 07/24/2019 09:00 AM Has been: Held Hon. Tracy Lee Lyons, Presiding			
07/24/2019	Participants at Court Event - Defendant not in Court - Assistant District Attorney O'Rourke - Probation Representative Sweeney - Session Clerk - kws - Courtroom and Time - 14/ 9:18. Atty Carroll appears...deft not in custody  Judge: Lyons, Hon. Tracy Lee			
07/24/2019	Pretrial conference report filed. 5			
	Judge: Lyons, Hon. Tracy Lee			
07/24/2019	Defendant's presence excused. Continued to September 20-PTH-Rm 14  Judge: Lyons, Hon. Tracy Lee			
09/20/2019	Event Resulted: Pretrial Hearing scheduled on: 09/20/2019 09:00 AM Has been: Held Hon. Sally A Kelly, Presiding			
09/20/2019	Participants at Court Event - Defendant in Court - Assistant District Attorney Seol - Probation Representative Rodriguez - Session Clerk - KWS - Courtroom and Time - 14/909. Atty Carroll present  Judge: Kelly, Hon. Sally A			
09/20/2019	Released on Personal Recognizance  Judge: Kelly, Hon. Sally A			
12/10/2019	Event Resulted: Discovery Compliance & Jury Election scheduled on: 12/10/2019 09:00 AM Has been: Defendant defaulted-Fl to Appear Hon. Mark H Summerville, Presiding			
12/10/2019	Participants at Court Event - Defendant not in Court - Assistant District Attorney Hartley / Erickson - Probation Representative Moy - Session Clerk - kn - Courtroom and Time - 14/ 9:15, 9:59, 11:38, 12:04. Atty Carroll appears			
12/10/2019	No arrest warrant to issue unless defendant before court or further order of court entered. Judge: Summerville, Hon. Mark H			
12/10/2019	Defendant arrives late. Default warrant recall fee waived. Judge: Summerville, Hon. Mark H			
12/10/2019	Nolle Prosequi received, filed and accepted. 6 Judge: Summerville, Hon. Mark H			
12/10/2019	Evidentiary Trial / Hearing Notes Judge: Summerville, Hon. Mark H  Legal counsel fee remitted per c277. sec 14			
12/10/2019	Charges Disposed:: Charge # 1 SEX OFFENDER FAIL TO REGISTER, LEVEL 2 OR 3 c6 §178H(a)(1) On: 12/10/2019 Judge: Hon. Mark H Summerville Nolle Prosequi  Judge: Summerville, Hon. Mark H			
12/30/2019	Defendant's motion to request waiver of costs for transcription of hearing, filed with the following, if any, supporting documents: 7			
12/30/2019	Affidavit of Raheem Rasheed Abubardar of indigency received and filed, filed. 8			
12/30/2019	Event Resulted: Hearing to Review Status scheduled on: 12/30/2019 09:00 AM Has been: Review Completed Hon. Eleanor C Sinnott, Presiding			
12/30/2019	Participants at Court Event - Defendant in Court - Assistant District Attorney O'Neill - Probation Representative Jurczak - Session Clerk - kw - Courtroom and Time - 17/ 3:10. no atty present  Judge: Sinnott, Hon. Eleanor C			

7/1/2020

## Case Details - Massachusetts Trial Court 4

<u>Docket Date</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>File Ref</u>	<u>Image Avail. Nbr.</u>
12/30/2019	Motion to waive costs of CD recording ALLOWED. Allowed.  Judge: Sinnott, Hon. Eleanor C			

## Case Disposition

<u>Disposition</u>	<u>Date</u>	<u>Case Judge</u>
Pending		

07/13

VTH 8

COMMONWEALTH OF MASSACHUSETTS

Suffolk, ss.

**NOTIFY**

Suffolk Superior Court  
Docket No. 193862C

Raheem Rashed Abubardar, SUFFOLK SUPERIOR COURT  
CIVIL CLERK'S OFFICE

Plaintiff

2020 JUL -9 P 12:35 **APPOINTMENT OF  
SPECIAL PROCESS SERVER**

MICHAEL JOSEPH DURAN **UNDER RULE 4C**  
CLERK / MAGISTRATE

Detective Ismael Henriquez, et.al.

Badge Number 91894

Area B-2 Station

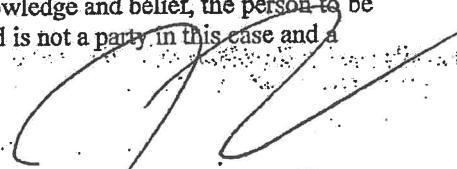
And

Mr. William G. Gross

The Boston Police Commissioner

Defendants

The Plaintiff moves pursuant to Rule 4C of the Massachusetts Rules of Civil Procedure that this Court appoint Adam Loomis and/or any of his employees, designee's or servants as process server in this matter, qualified and knowledgeable persons in the service of all court process, limited to any and all pre-judgment service of process. The undersigned swears that to the best of his knowledge and belief, the person to be appointed is eighteen years of age or over and is not a party in this case and a disinterested person.

  
Jason Benzaken, Esq.  
Benzaken, Alexander and Wood, PC.  
1342 Belmont Street, Suite 102,  
Brockton, MA 02301  
(Tel) 508-897-0001  
(Fax) 508-587-5455  
BBO No. 658869  
[attorneybenzaken@gmail.com](mailto:attorneybenzaken@gmail.com)

Notice Sent

07.14.20

JB

BATWpc

MO

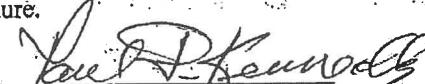
**ORDER OF THE COURT APPOINTING SPECIAL PROCESS SERVER**

This action came on for hearing before the Court, 7/13/20, presiding upon Plaintiff's Motion for Appointment of a Person to Serve Process, and thereupon, consideration thereof, it is Ordered and Adjudged that Adam Loomis and/or any of his/her employees, designee's or servants are appointed Special Process Server for the express purpose of serving any and all pre-judgment service of process in this action pursuant to Massachusetts Rule 4C of Civil Procedure.

Dated: 7/13/20

Aft:

By:

  
Lee P. Kennedy  
Asst. Clerk



DEPARTMENT

1 Schroeder Plaza, Boston, MA 02120 2014

Page 1 of 1

Date 7/28/2020

**DISTRICT/UNIT: Special Investigations Unit**

**To:** Lieutenant Patrick J. Cullity  
Commander, Special Investigations Unit

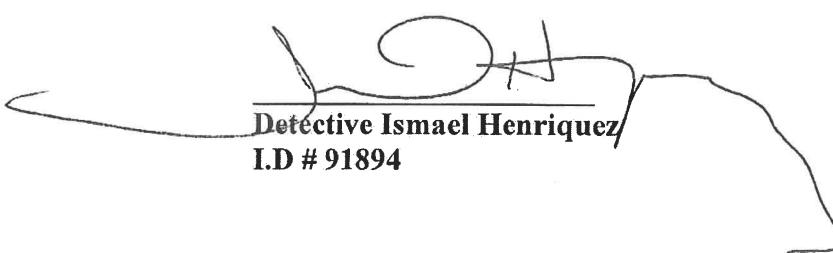
**From:** Detective Ismael Henriquez, ID # 91894

**Subject:** Request for legal representation in the matter of Raheem Rashed Abubardar v. Detective Ismael Henriquez and Mr. William Gross et, al; currently pending in Massachusetts Trail Court of the Commonwealth Suffolk Superior Court Department, Civil Action No. 1984CV3862C

Sir:

I respectfully report I was notified that I was named as a defendant in the matter of Raheem Rashed Abubardar v. Detective Ismael Henriquez and Mr. William Gross et, al; currently pending in Massachusetts Trail Court of the Commonwealth Suffolk Superior Court, Civil No. 1984CV3862C . I am requesting legal representation from the department on this matter. I have attached a copy of the complaint with this request.

Respectfully submitted

  
Detective Ismael Henriquez  
I.D # 91894

*CONTAINS HAND APPEND*  
*AT DO NOT STAMP*